

Integrating The Monorail

WEST SEATTLE

DEIS Comments

City of Seattle Comments on the
Seattle Monorail Green Line
Draft Environmental Impact
Statement

October 2003



City of Seattle

OVERVIEW

The City's DEIS comments related to the West Seattle emphasize the need to refine the alignment and station location alternatives to avoid or minimize impacts to the natural environment, the need to identify specific measures to mitigate impacts to parking supply and demand, and the need to more definitively describe project scope and design features that will make the Green Line consistent with neighborhood visions and plans.

ACCESS & MOBILITY

Because of sight distance requirements, the center-of-roadway alignment alternative on California Avenue SW will likely require restrictions to left-turns into and out of driveways and result in limited storage lengths for left-turn lanes at intersections. These appear to be unavoidable adverse impacts. The west alignment shows greater potential to be integrated into a roadway design that maintains the essential access and mobility functions of the roadway.

Traffic Operations

The DEIS states that "for analysis purposes, the Green Line could include a new traffic signal at the SW Avalon Way/SW Genesee Street intersection..." The analysis presented in this report assumed the presence of that signal (see page 4-75); it should be clearly stated that this signal will be provided (4-76).

The DEIS states that "Columns could be located to minimize impeding side street intersections, driveways, or loading docks, and to provide adequate sight distance around the columns." However, substandard width is a significant impact on California Avenue due to the inability (in the SMP proposal) to accommodate fire and life safety issues. SMP should develop a set of mitigation tools and alternative strategies to address the Fire Department's standards given parking and narrow lane widths (4-79).

If the guideway does not meet 20' vertical clearance above the roadway on California Avenue, oversized vehicle movements on California Avenue SW would be limited. This may have significant impacts on movements on California Avenue SW and other parallel arterials. The FEIS should discuss alternative routings and mitigation of this issue (4-83).

The FEIS should delete the discussion of "traffic circles" or "roundabouts" to reflect analysis completed after the publication of the DEIS, indicating that adequate turning radii cannot be accomplished without extensive property acquisition and widening of intersections (4-97).

Transit, Bicycle & Pedestrian Connections

The FEIS should include more definitive drawings and descriptions of the project facilities that will result in good intermodal connections such as effective bus transfers at Delridge and Avalon and improvements to pedestrian access to those stations that may present access challenges. At minimum, space to accommodate future improvements necessary to attract and accommodate ridership should be provided at station areas.

Impacts to Parking Demand

The City believes that hide-and-ride parking impacts are inevitable within one-quarter mile of the West Seattle segment stations unless parking management programs and measures are implemented. The Project Description should include a commitment to parking management programs and measures. The specific programs and measures can be identified later in the project design and approval process, with assistance from the City and input from neighborhood stakeholders. The Project Description should commit to implementation of parking management strategies before stations open, to avoid

rather than react to hide-and-ride parking impacts.

Impacts to Parking Supply

Due to the size of the West Seattle segment, parking is added in areas at a substantial distance from where displaced. Short-term parking in commercial areas serves different parking needs than unrestricted parking in residential areas. The FEIS should acknowledge that replacement parking may not entirely serve the needs of those in the displaced parking areas (4-81).

Impacts to the parking supply should be mitigated through measures such as those described in the Transportation section of the City's comment letter.

NEIGHBORHOODS & BUSINESSES

The DEIS states that "the guideways would be generally at or lower than zoning heights allowed for new buildings; but in Morgan Junction where zoning limits buildings 30 to 40 feet in height, station structures could be up to 20 to 30 feet higher. However, the development of California Avenue SW varies between commercial uses and residential uses". It may be more appropriate to note that the stations would likely be elements of distinction in this area, and that the City's Land Use Code has been amended to provide guidelines for integrating the necessarily higher stations into their environs. As with the Ballard segment, the commercial zoning along California frequently is only half a block deep; stations located on the west side of California may have substantial impacts on residential properties immediately west of the station sites (4-154).

Morgan Junction is identified as a medium to large-scale commercial district, despite its 30' zoning height limit. The FEIS should correct this inconsistency (4-218).

The shade/shadow and other visual impacts of a cross-over structure may result in moderate to high impacts on the commercial

district (4-217). This should be discussed in the FEIS.

In Alternative 6.1 and 6.2, the land use and economic impacts of the high end of the range in reduction to parking supply should be discussed in the FEIS and mitigation should be identified (4-81).

NATURAL ENVIRONMENT

Longfellow Creek

There are a variety of potential impacts to Longfellow Creek that are discussed in various sections of the DEIS; it would be helpful if the FEIS could provide a consolidated analysis of these impacts, perhaps in the Cumulative Impacts section. For example, it would be helpful to capture the combined visual and noise impacts of the train and of increased traffic and transit activity would be expected to detract substantially from the sanctuary quality currently offered by the Longfellow Greenspace for the public, fish and wildlife (4-215).

The entrance to the culvert at SW Andover Street is the point of entry for all the coho and chum salmon entering the daylighted portion of Longfellow Creek. The proposed site alternatives of the Delridge Station and guideway presented in the DEIS are limited to locations in or adjacent to this sensitive area. Noise, pedestrian and vehicular traffic, increased runoff and water pollutants from impervious surfaces are all existing concerns for salmon and creek health. The addition of impacts introduced by the construction and long-term operation of the station and guideway, in combination with the additional impacts of anticipated future on-street support facilities for the Green Line are all of concern. We understand that SMP is working to refine alignment alternatives in the vicinity of Longfellow Creek to avoid or minimize encroachment on the Creek and its floodplain. We are supportive of your investigation of such alternatives.

In Section 4.12.4.2 - Segment 6 West Seattle Segment, the FEIS should provide more information on the risk levels associated with disturbing the five documented EDR release sites adjacent to Delridge 1 and 2. The leading hypothesis for the cause of coho pre-spawning mortality is water pollution, and metals and PAHs are among the candidate pollutants under investigation (Katherine Lynch, Urban Creeks Biologist, SPU, personal communication). Additional releases of these pollutants during construction could impact the Delridge/Longfellow Creek site (4-363 to 4-365).

The DEIS should make it clear that selection of the location of the guideway and station will both set in motion and limit the siting of future support-facilities in the immediate area, which potentially increases the level of encroachment on Longfellow Creek. Both of the DEIS alternatives allow for development of on-street facilities (bus facilities, layover facilities, and potentially for commercial/retail facilities). The DEIS gives the impression that there is a recognized need for support-facilities. On-street support facilities are expected to have greater impacts to the creek (pedestrian and vehicular traffic, noise, pollution) than the spanning structures of the guideway and the station. Siting the guideway and station so close to Longfellow Creek would increase the probability that the completed development (Green Line and support facilities) would further impact Longfellow Creek. (Project Description Section)

The DEIS should specify where the location of the optional bus facilities to "the south of the station" would be. The concern is that siting the station and guideway close to Longfellow Creek increases the likelihood that the bus facilities also will be located close to the creek and would increase level of impact to the creek (parking lot runoff, pollutants, noise, pedestrian and vehicular traffic from a large on-street facility). (Project Description Section)

The description of impacts for area near Longfellow Creek Greenspace should

summarize number and type of trees removed and address the extent of the resulting impact to the character of the surroundings (4-215).

Visual impacts on Longfellow Creek should be categorized as "high" rather than "moderate to high" (4-215).

The description of impacts for the area near Longfellow Creek Greenspace should summarize number and type of trees removed and address the extent of the resulting impact to the character of the surroundings (4-217).

In Section 4.10.3 - Mitigation - Mitigation of impacts to the Longfellow Creek Greenspace through increased lighting and/or access would be of questionable improvement as these would continue to detract from the quality of the site for both people and wildlife (4-306).

Whereas the Executive Summary reports that "there would be no significant unavoidable adverse impacts on parks", Section 4.10.4 indicates that the project would result in significant unavoidable adverse impacts on Longfellow Creek Green Space. The City concurs with Section 4.10.4 and suggests that comments to the contrary elsewhere in the document should be made consistent (4-307).

At the Delridge Station sites at Longfellow Creek there may be increased localized levels of metals and pollutants once the Green Line is in operation due to the increased levels of traffic, cars and buses accessing the station. The argument that the overall pollutant levels will decrease is accurate but the local water quality discharge point does not benefit - only the larger downstream receiving water body like Elliott Bay. (Water Section)

The increase in flow out of the culvert that is carrying Longfellow Creek into Duwamish River could negatively impact habitat at the outflow of this culvert; this impact should be analyzed (4-424).

The boundary of the Longfellow Creeks floodplain should be determined and development within the floodplain should be avoided if possible. Columns in the floodplain will have an impact and this impact should be addressed (4-424).

West Seattle Stadium Park

The FEIS should further discuss the nature of an easement and agreement between SMP and the City (Department of Parks & Recreation) that would be required for the monorail facilities proposed to be located over City Park property, including compliance with City Ordinance 111606. The Ordinance requires not only that replacement property "restore the park functions" but that it must be "of equivalent or better size, value, location and usefulness in the vicinity, serving the same community and the same park purposes" (4-306).

The discussion of West Seattle Stadium Park delineates numerous view impacts, however no mitigation is proposed; the FEIS should identify mitigation (4-217).

The DEIS is not persuasive in stating that visual impacts can be completely mitigated by "landscaping, special signage, lighting, and access." If station design has proceeded to a conceptual level prior to the publication of the FEIS, it may be possible for the FEIS to incorporate information from station design that would demonstrate how the mitigation could be effective. The City's Department of Parks and Recreation should have a significant role in this station design process.

Impacts as a result of the removal of forty to fifty mature trees at Avalon 2 should be categorized as "significant" (4-217).

The DEIS analyzes potential impacts to the park largely in terms of park operations and does not thoroughly address the visual affect that the Monorail has on parklands. The DEIS should also discuss the effects to the park "experience" at West Seattle Stadium. (Park & Recreation Section)

Information about the dimensions of stations and guideways—especially heights and widths—is vague. In the case of the Avalon 2 station, the building length of about 240' (as scaled from drawings) appears at odds with the "conservatively high 180 feet" set forth in the "Project Description" section.

Table 4.10-2 does not include a Pro Parks project that is potentially significant to the proposed Green Line because it is directly adjacent to the Avalon 2 station alternative. There are funds available to "improve WS Stadium for a variety of active uses including track and field." The general expectation is that the work would occur in 2005 or 2006. The scope of the improvements have yet to be finalized but would include the area at the west end of the stadium, below the slope along 35th Ave SW. Since the location of the Avalon station is not clearly defined, it is unclear what conflicts might exist between the Pro Parks project and the station. (An outline of all Pro Parks projects can be found at the following URL: <http://www.ci.seattle.wa.us/parks/proparks/map.htm>) (4-299).

The description of the West Seattle Stadium is incomplete. The purpose and size of the parking lot should be noted. The description should include something similar to the following: "Also on the site is a parking lot that serves both the Stadium and the West Seattle Golf Course and provides spaces for X autos." Similarly, the trees on the western boarder are an important element with respect to character and effect on visual environment. "The site is bordered on the west by 35th Avenue SW but separated from it by a steep slope topped with a screen of mature deciduous and conifer trees. The stand of trees is 30 to 40 feet wide at the north end and about twice that at the Stadium access drive. Because of the terrain and the trees, views to the west are contained and views to the east are open and directed" (4-303).

The DEIS incorrectly identifies the sloped, wooded area at the west end of the West Seattle Stadium site as an area for “passive recreation”. This area is actively used as the outfield for a variety of track and field sports including hammer, shot put, javelin, and discus (4-306).

The DEIS says that removal of the tree buffer “could affect the stadium site since the wooded hillside provides a backdrop”. Although the nature of this impact is not adequately explained, the Parks department believes that removal of the tree buffer is a “significant impact” by virtue of its effect on the character of the open space and should be identified as such. This is a much more serious impact than the “moderate to high” impact to the Ballard Pool as reported on page 303, last paragraph. By comparison the impact to West Seattle Stadium is clearly “high” and “significant” (4-306).

If the Avalon 2 station is built as planned, the entire stand of trees will be removed and the character of the Stadium area will be dramatically—and negatively—affected. Since this is parkland, visual impacts should probably be measured in broader terms than simply views obstructed. Similarly, recreation is more than operational performance; it carries with it quality of life issues (4-306).

The separation created by this collection of mature trees is a significant factor in the spatial definition and character of the Stadium area. Along with the slopes to the southwest, west, and northwest, the trees define the space and focus it eastward. The distinctiveness of the spatial definition is a strong characteristic of the facility (4-306).

The trees form a backdrop to the field events at the Stadium and contribute a pastoral quality to the athletic setting. Construction of the Monorail will replace the soft, natural border of trees on the brow of the hill with a six-story tower flanked by a stark, hard-edged march of columns under a ribbon of concrete. The character of protection and buffer provided by the trees

will be replaced by one of exposure and surveillance (4-306).

The principal value of park property, along with recreation, is one of aesthetic experience. Trees and other vegetation contribute to this. Trees, in fact, are an integral element to the concept of park. Although the DEIS reports only 18 to 23 trees to be removed, an informal count indicates that considerably more trees are likely to be removed. A minimum of 45 trees with a dbh greater than 9” appear to be in the path of the project (4-306).

The DEIS overlooks potentially serious operational impacts the Avalon 2 station would have on parking for both the Golf Course and the Stadium. Informal inquiries indicate that, on a typical weekday, currently 30-40 of parked vehicles are hide & ride commuters who have parked inappropriately. Furthermore, observation indicates that parking within 2-3 blocks of the station location are at, or very near 100% occupied on a typical weekday near noon. Presumably, hide and ride parking occurs at the nearest available parking space to the station. Once the Monorail is operational, it is reasonable to assume that most of the available parking capacity of the lot could be filled by commuters by virtue of its proximity to the station. This probable scenario should be reflected in the document, along with proposed mitigation (4-306).

On page 4-96, the DEIS states, “A high potential for park-and-hide parking impacts exists in the West Seattle Segment.” The discussion on page 306 should be made consistent with this observation. A further effect might occur as parking demand increases in neighboring residential areas. As in other parts of the city, such increases are very likely to encourage the conversion of unrestricted parking to restricted parking, especially RPZs. This would add further pressure on the stadium parking lot. This possible effect should be reflected in the document. Comments in the transportation section relative to the estimates of hide-and-

ride demand should be reflected in this section as well (4-306).

The DEIS states that effects from the project “could be perceived as a significant unavoidable adverse impact by park users”. This statement misrepresents the purpose of the DEIS with respect to assessing the significance of impacts as defined by SEPA (see WAC 197-11-400(2)). Instead, the section should directly say that implementation of the project would cause changes that constitute significant unavoidable adverse impacts. The conditional word “could” and the reference to “park users” weaken the assessment of the impacts and should be removed (4-307).

Pigeon Point Greenbelt

The DEIS indicates that “trees and other vegetation would likely have to be removed”. The document should indicate the extent—the number or total acres of trees—that would have to be removed. Without such specificity, assessment of the degree of impact cannot be judged (4-305).

Construction staging has the potential for significant impact on open properties near station sites. The DEIS addresses the issue largely in general terms saying that staging would occur principally within station sites but that these may need to be augmented in some cases. While the document lists different staging area options for most other segments of the Green Line, it is unclear about possibilities for the West Seattle Segment. The DEIS identifies the “West side approach to West Seattle Bridge” as “typical of locations that contractors might choose” and mentions, “Only one apparent property suitable for construction staging exists”. This issue should be detailed and resolved to assure minimal impacts on Parks facilities in West Seattle (4-487).

A more complete analysis of the impacts of the removal of vegetation at the Pigeon Point Greenbelt on the species that inhabit this area should be completed in order to determine appropriate mitigation (4-458).